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BMW OF NORTH AMERICA, LLC

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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA

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18 DANIEL CERVANTES, individually and on
behalf of all others similarly situated,

19 Plaintiff,

20 vs.
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22 BMW OF NORTH AMERICA, LLC, a
Delaware limited liability company; and
DOES 1 to 10, inclusive,

23 Defendants.

24 Case No. 2:21-cv-01807-TLN-KJN

25 [Hon. Troy L. Nunley]

26 **JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT BMW OF
NORTH AMERICA, LLC TO RESPOND
TO INITIAL COMPLAINT**

27 Complaint Served: October 6, 2021
Current Response Date: November 24, 2021
New Response Date: December 22, 2021

1 WHEREAS, Plaintiff Daniel Cervantes (“Plaintiff”) filed his Complaint on September 30,
2 2021;

3 WHEREAS, Defendant BMW of North America, LLC (“Defendant”) (Plaintiff and
4 Defendant collectively referred to as the “Parties”) was served on October 6, 2021 such that
5 Defendant’s current responsive pleading deadline is October 27, 2021;

6 WHEREAS, through the Parties’ prior stipulation, Defendant’s current response deadline
7 is November 24, 2021;

8 WHEREAS, Defendant is in the process of assessing Plaintiff’s allegations in this action
9 which is a time-consuming process given the highly technical nature of the allegations relating to
10 the accessibility of Defendant’s website; and

11 WHEREAS, the Parties’ respective counsel have met and conferred and stipulated to a 28-
12 day extension of time for Defendant to respond to Plaintiff’s Complaint.

13 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through the
14 Parties’ respective counsel as follows:

15 Defendant’s deadline to file a responsive pleading to Plaintiff’s Complaint shall be
16 extended by 28 calendar days to December 22, 2021.

17 Dated: November 22, 2021

WILSHIRE LAW FIRM

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By /s/ Thiago Coelho

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Thiago Coelho
Attorney for Plaintiff
DANIEL CERVANTES

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Dated: November 22, 2021

MORGAN, LEWIS & BOCKIUS LLP

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By /s/ Kathy H. Gao

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KATHY H. GAO
Attorney for Defendant
BMW OF NORTH AMERICA, LLC

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SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: November 22, 2021

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Kathy H. Gao

KATHY H. GAO
Attorney for Defendant
BMW OF NORTH AMERICA, LLC

ORDER

After considering the Parties' stipulation and good cause appearing, IT IS HEREBY ORDERED that: Defendant's deadline to respond to Plaintiff's Complaint shall be extended to December 22, 2021.

IT IS SO ORDERED.

Dated: 11/23/2021


Troy L. Nupley

Troy L. Nunley
United States District Judge